

Larry W. Wheeler
5904 Co. Rd. 64
Spencerville, IN
46788-9715

Federal Communications Commission
Office of the Secretary
1919 M Street N.W. Room 222
Washington, DC 20554

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FCC

Ref: WT 98-143

Dear Commissioners:

I would like to file the following comments on your Notice Of Proposed Rule Making on WT Docket No. 98-143:

A.) Reduction of the number of license classes from 6 to 4.

I agree that this action could be taken with minimal impact upon the Amateur Radio Service. It is no longer necessary to have "on the air" experience in order to acquire the skill needed to send and receive the Morse code. Through the use of personal computers and cassette tape players that were not available in 1951 when the Novice and Technician licenses were created, today's beginner can easily become proficient in the use of the code, if he desires to operate his equipment on the High Frequency radio bands.

I believe that the Novice and Technician Plus license holders should lose their H.F. operating privileges, on some appropriate date in the future. The Novice license was created to help the beginner obtain "on the air" experience. It seems to me that if sufficient notification is given, any Novice license holder will be able to upgrade to the Technician Plus or General class license. The Technician Plus licensee was given H.F. privileges in order to allow for exposure to the Morse code so that he too could upgrade. Given the availability of code study devices now is a good time to encourage license advancement for those who want to use the H.F. bands. Expiration of the H.F. privileges will permit the return of the Novice sub-bands to full power status for all licensees of General class and higher. Some have suggested that the Novice and Technician Plus license holders should be promoted to General class so as not to inconvenience them. That type of "giveaway" makes a mockery of the present license structure and it breaks a trust between the Commission and the licensees who were required to meet the standards of the General class license.

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- B. I am in agreement with your comments on Examiner Opportunities.
- C. I am in agreement with your comments on RACES Station Licenses.
- D. There appears to be an almost universal desire for strict FCC rule enforcement. I would like to recommend that the Commission consider recording the H.F. amateur bands using wide bandwidth techniques. This simple procedure would greatly enhance the enforcement capabilities of the Commission while at the same time it would serve as a deterrent to intentional interference. If every would-be rule breaker knew that the Commission was recording and archiving all of the signals on the amateur radio frequencies it would cause him to think earnestly about the consequences of his actions.

I believe that the FCC Amateur Auxiliary should be open to all qualified license holders. At the present time, only those who purchase a membership in the American Radio Relay League are permitted to be a part of the Auxiliary. The ARRL now represents the smallest percentage of licensed hams since its creation, and is losing ground in a steady fashion. Limiting participation in the Auxiliary to "paid up" members greatly reduces its effectiveness as well as its credibility.

- E. As mentioned before, the availability of code sending and receiving apparatus has eliminated the need for a slow speed apprentice license. I believe that unless an operator can copy by hand at least 12 words per minute, he is just relying on memory and has not developed the reflex that is required to be a competent operator. Since memory slips away, but reflexes generally do not, I think that lowering the speed requirement would eventually lead to the loss of our most cost and bandwidth efficient mode. With reference to the ARRL survey: Asking those who have not attained the Amateur Extra license if they favor reducing the Morse code speed requirement is hardly a guideline for what the Commission should do. I believe that the 20 word per minute and the 13 word per minute speeds should be retained. The higher speeds help to encourage new amateurs to "test the waters" and to become active in message handling and in the construction of simple radio equipment.

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Receivers and transmitters used for "advanced modes" are very intimidating to most of today's amateurs. Consequently, many are not capable of repairing their own equipment unless their learning has progressed from basic circuits to the advanced systems used today. Lowering the code speed "short circuits" the learning opportunities for many newcomers because they are never challenged to learn the fundamentals of the radio art. In the 38 years that I have been active as a licensed amateur, I have seen how the Commission's well intended changes have led to the fractionalization of the amateur radio service. As each "new and better " rule is enacted, taking from some and giving to others, the glue that we call fraternalism gradually dries up and loses its power to bind.

Sincerely,

A handwritten signature in cursive script that reads "Larry Wheeler".

Larry Wheeler, W9QR